

ZEMAN & WOMBLE, LLP

KEN WOMBLE
66 WILLOUGHBY STREET
BROOKLYN, NY 11201

P (718) 514-9100
F (917) 210-3700
WOMBLE@ZEMANWOMBLELAW.COM

WWW.ZEMANWOMBLELAW.COM

VIA ECF & FAX
Hon. Paul G. Gardephe
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

September 25, 2019

Re: *United States v. Cardona-Cardona*, 18 Cr. 601 (PGG)

Dear Judge Gardephe,

I represent David Cardona-Cardona in the above-referenced matter, along with co-counsel Donna Newman, and submit this *ex parte* letter application for approval of interim attorney vouchers under the Criminal Justice Act.

Since my appointment on August 5, 2019, I have spent a substantial number of hours reviewing the voluminous discovery, conducting legal research and visiting my client. This case has proven to be complex and the complexities have demanded substantial attention from counsel. The amount of discovery as well as the review of relevant video and audio recordings and the accompanying transcripts has consumed many days. Dissecting and digesting this material into a workable amount that would allow efficient and effective review with my client has been extremely time-consuming.

In light of the foregoing, I respectfully request that this Court approve my request for interim payments in this case pursuant to Guide to Judiciary Policy, Vol. 7 Defender Services, Part A Guidelines for Administering the CJA and Related Statutes, Chapter 2: Appointment and Payment of Counsel, § 230.73, as well as pursuant to the United States District Court for the Southern District of New York's Revised Plan for Furnishing Representation Pursuant to the Criminal Justice Act, Sec. IX(D).

Thank you for your consideration of this request.

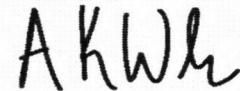
MEMO ENDORSED

The Application is granted.

SO ORDERED:

Paul G. Gardephe, U.S.D.J.
Dated: Dec. 3, 2019

Respectfully,



Arthur Ken Womble
Counsel for David Cardona-Cardona